

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-2(c)

LAW OFFICES OF SCOTT H. BERNSTEIN LLC

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*Attorney for American Builders & Contractors
Supply Co., Inc. d/b/a ABC Supply Co., Inc.*

In re:

COASTAL CONSTRUCTION GROUP, LLC,

Debtor.

Hearing Date: 1/02/25 @ 10:00 a.m.

ORAL ARGUMENT REQUESTED

Chapter 11

Case No. 24-15203

Honorable Michael B. Kaplan

DECLARATION OF SCOTT H. BERNSTEIN

I, SCOTT H. BERNSTEIN, declare pursuant to 28 U.S.C. § 1746 and under penalty of perjury, that the following is true and correct:

1. I am the attorney for American Builders & Contractors Supply Co., Inc. d/b/a ABC Supply Co., Inc. (“ABC”), a creditor who never received notice of the above-captioned bankruptcy case of Coastal Construction Group, LLC (the “Debtor”).

2. I make this Declaration on my personal knowledge in support of ABC’s *Objection to Debtor’s Motion for an Order Dismissing its Chapter 11 Case*.

3. Attached hereto as Exhibit 1 is a true and correct copy of the Debtor’s *Voluntary Petition, Schedules of Assets and Liabilities, Statement of Financial Affairs, Creditors Matrix, and List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders* [Docket No. 19].

4. Attached hereto as Exhibit 2 is a true and correct copy of the Debtor's *Claims Register* which I printed off the Court's website on December 18, 2024.

5. Attached hereto as Exhibit 3 is a true and correct copy of the Debtor's *Notice of Chapter 11 Bankruptcy Case* [Docket No. 8].

6. Attached hereto as Exhibit 4 is a true and correct copy of ABC's *Verified Complaint* (with exhibits) which ABC filed against Dean Rado in the Superior Court of New Jersey, Ocean County Vicinage, on October 30, 2024. Ashley Harloff, a Debt Recovery Analyst at ABC, verified ABC's Verified Complaint under the penalty of perjury.

7. Attached hereto as Exhibit 5 is true and correct copy of a printout of a docket sheet for the Debtor's bankruptcy case which I printed off the Court's website on December 18, 2024.

8. Attached hereto as Exhibit 6 is a true and correct copy of the unpublished decision of *In re Just Plumbing & Heating Supply, Inc.*, No. 11-10151 (MG), 2011 Bankr. LEXIS 4021, (Bankr. S.D.N.Y. Oct. 18, 2011). I am unaware of any published decisions to the contrary.

9. Attached hereto as Exhibit 7 is a true and correct copy of the unpublished decision of *In re Georgian Backyard LLC*, No. 23-43881 (JMM), 2024 Bankr. LEXIS 925 (Bankr. E.D.N.Y. April 18, 2024). I am unaware of any published decisions to the contrary.

10. Attached hereto as Exhibit 8 is a true and correct copy of the unpublished decision of *In re Kuvykin*, No. 18-10760 (JLG), 2019 Bankr. LEXIS 631 (Bankr. S.D.N.Y. Feb. 26, 2019). I am unaware of any published decisions to the contrary.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on December 18, 2024 in Roseland, New Jersey.

Scott H. Bernstein

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